

September 11, 2013

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Ms. Laura Beaufort
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

IDENTIFICATION NUMBER: C00541540

REFERENCE: 12 DAY PRE-GENERAL REPORT (4/11/2013—06/05/2013)

Dear Ms. Beaufort,

This statement is in response to the Commission's letter dated August 9, 2013. The Commission requested additional information on three items.

First, the Commission requested clarification on contributions that appear to exceed federal limits. Most individuals or committees that appear to exceed the contribution limits do not. Any amount over the contribution limits has been refunded, reattributed within the 60 days, or re-designated to the Committee's Primary Debt Retirement Account. These are reflected in subsequent reports. A few individuals were mistakenly over the limit due to duplicate records. As soon as the Committee was aware, contribution refunds were issued. These refunds are reflected on subsequent reports. The contribution from Edmund Kelly was properly reattributed to his spouse. The reattribution will be reflected on an Amended Report. The contribution from Earl K. Lewis III was from his spouse Barbara. This will be reflected on an Amended Report. Robert Anderson and Robert D. Anderson appear to be different individuals. Also, there appear to be two different individuals named Brian Chu. Please note the different addresses and employer/occupations.

Second, the Commission requested clarification on a contribution that appears to be from a corporation. The contribution reported as New England PBA, Inc. was from the New England Police Benevolent Association, Inc. Political Action Committee, a non-federal committee—not a corporation. The report will be amended to clarify the committee name. With respect to non-federal committees, our Committee has safeguards in place to ensure that these committees used permissible funds for the contributions.

Third, all contributions of \$1,000 or more received during the 48-Hour Notice Period were reported within 48 Hours. The contributors listed in the RFAI represent memo transactions reflecting either reattributions or redesignations.

This should answer the Commission's inquiry.

Sincerely,
Bradley T. Crate
Treasurer

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